

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

ANTONIO LEE COTTON

Case: 2:21-mj-30310
Judge: Unassigned
Filed: 06-24-2021 At 04:28 PM
CMP USA V SEALED (kcm)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 16, 2021 and May 23, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1951	Interference with Commerce by Robbery

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: June 24, 2021

City and state: Detroit, MI



Complainant's signature

Matthew Allwes, Special Agent, FBI

Printed name and title



Judge's signature

Hon. Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I. Purpose of Affidavit and Affiant Training and Experience

I, Matthew Allwes, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the FBI and have been since September of 2019. I am currently assigned to the FBI Detroit Division's Violent Crime Task Force ("VCTF"). Prior to working at the FBI, I was a Border Patrol Agent for four years in Douglas, Arizona. As a Federal Agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. I have conducted investigations of federal and state violations concerning crimes of violence, firearms, narcotics, and bank theft. I have gained experience through training and everyday work related to these types of investigations. My duties involve the investigation of violent crimes, to include investigations related to narcotics trafficking, the use of cellular devices to commit federal criminal offenses, and the available technology that can be used by law enforcement to assist in identifying the users of cellular devices and their location. I have experience in the investigation, apprehension, and prosecution of individuals involved in federal criminal offenses.

3. The statements contained in this Affidavit are based on my experience and background as a Special Agent, on my review of law enforcement reports and

surveillance footage, and on information provided by police officers, other FBI agents, and other law enforcement personnel, as well as communications with others who have personal knowledge of the events and circumstances described herein. This Affidavit is intended to show merely that there is sufficient probable cause for the issuance of the requested criminal complaint and arrest warrants. Thus, this Affidavit does not set forth all of my knowledge of this investigation.

4. Based on the facts set forth in this Affidavit, there is probable cause to believe that on May 16, 2021 and May 23, 2021, ANTONIO COTTON robbed two separate Dollar Tree stores in the Eastern District of Michigan, in violation of 18 U.S.C. § 1951 (Interference with Commerce by Robbery).

II. Probable Cause

5. The FBI is investigating two armed robberies that occurred at two separate Dollar Tree stores in the Eastern District of Michigan on May 16, 2021 and May 23, 2021, in violation of 18 U.S.C. § 1951 (Interference with Commerce by Robbery). As described in greater detail below, there is probable cause to believe that ANTONIO LEE COTTON committed these robberies.

A. May 16, 2021 Armed Robbery

6. I reviewed a police report regarding an armed robbery of the Dollar Tree at 2050 E. 8 Mile, Detroit, Michigan that occurred on May 16, 2021. According to the police report, at approximately 7:45pm, two employees, a

clerk and a manager, were working at the cash registers. The store was scheduled to close at 8:00pm. The subject was the last customer in line and waited until all other customers left the store before checking out. While the clerk was preparing to ring up the subject's purchase, the manager began preparing the store for closing. After approaching the checkout counter, the suspect produced a black handgun, pointed it at the employee at the counter, and stated "give me all the money." The suspect then tied the clerk's hands using zip ties and forced the manager to empty the cash register tills and the safe in the office. The suspect then tied the two employees together with zip ties. The suspect fled with \$10,270 in cash and took the security camera equipment from the manager's office.

7. There was no surveillance footage available from inside the Dollar Tree. I did, however, review surveillance video from the Belmont Shopping Center where the Dollar Tree was located and from a nearby apartment complex. Those videos depicted the following. At approximately 7:30pm, a lone black male parked a dark gray, older model Chevrolet Trailblazer on Fleming St. facing northbound. The male exited the driver's side of the vehicle and began walking northbound towards E. 8 Mile Road. The male headed west on E. 8 Mile Road, briefly walked into a permanently closed Subway parking lot, then continued westbound on E. 8 Mile Road. The male then turned southbound in front of the Dollar Tree and walked into the main entrance of the store. The male,

who appears to be in his thirties, entered the store wearing a dark hooded jacket, a surgical style facemask, light-colored pants, white shoes, and glasses.¹

8. The male spent approximately 20 minutes inside of the Dollar Tree. The surveillance footage depicts the male walking out of the store, fleeing eastbound on E. 8 Mile Road, and continuing southbound down Fleming St. where he had parked the Chevrolet Trailblazer. The footage depicts the male carrying a plastic bag and what appears to be a DVR surveillance system. The male enters the Trailblazer and reverses southbound down Fleming St. before fleeing out of camera view. Based on the above, it is my belief that the male depicted in the external surveillance footage is the suspect who robbed the Dollar Tree on this date.

¹ It should be noted that contrary to what is depicted on this surveillance footage, the victims reported that the robber was not wearing a mask, and one of the victims reported that he was wearing black shoes.

9. The dark grey Chevrolet Trailblazer can be seen on surveillance video with physical body damage to the driver-side front door. It is also noted that the driver side rear wheel is missing a center cap. Below is a screenshot from the external surveillance video depicting the vehicle.



B. May 23, 2021 Armed Robbery

10. One week later, on May 23, 2021, another armed robbery of a Dollar Tree occurred, this time at the store located at 16551 10 Mile Road, Eastpointe, Michigan. I reviewed the associated police report and surveillance video, which reflect the following. A black male subject wearing an all grey jogging suit, a surgical mask, white shoes, and a flat-brim hat entered the store at approximately 7:32pm. The store was scheduled to close at 8:00pm. The suspect came through

the employee's checkout line three separate times. At 8:02pm, the subject signed into the store's sign-in sheet with the name Eric Popular and phone number 586-339-1020. Shortly after, the subject began talking to the manager, who was also in the store. He told both the employee and the manager to go to the office and pulled out a black handgun. He put the barrel of the gun into the employee's back as he walked her to the office. Once there, the suspect forced the manager to give him the cash from the safe while the suspect zip-tied the other employee's hands together. He also forced the manager to give him money from a register till. Once the suspect got all the money, he then zip-tied the manager and the other employee together. The suspect also ripped the modem/router off of the wall in an attempt to disable the surveillance system. The suspect fled the store with approximately \$1,400.

11. Law enforcement recovered relevant surveillance footage from locations and businesses around the Dollar Tree depicting the following. The suspect arrived in a dark grey Chevrolet Trailblazer at an apartment complex to the west of the Dollar Tree on 10 Mile Road, minutes before the suspect first entered the Dollar Tree at 7:32pm. The suspect then left the surveillance camera's view while seemingly parking the Trailblazer. Less than approximately 20 seconds later, the subject walked from the area the Trailblazer entered and into the Dollar Tree. The suspect appears to be in his early thirties. The surveillance footage also

depicts the suspect running out of the Dollar Tree around the time the robbery was completed, carrying a plastic bag. The footage depicts him run to the area where the Chevy Trailblazer was parked. A few moments later, the footage depicts the Trailblazer begin traveling westbound on 10 Mile Road. This Trailblazer depicted in the surveillance footage was a similar class and had similar characteristics to the vehicle driven by the suspect in the May 16, 2021 robbery described above, including the same damage to the driver's side door.

12. Based on my review of still photographs and video surveillance, the subject appears to be the same race, height, build, and weight in both robberies. These two robberies also involve similar modus operandi. In each robbery, the suspect: (1) was a black male who appeared to be in his early thirties, (2) entered the Dollar Tree alone shortly before the store closed, (3) wore dark or grey clothes, a surgical facemask, and white shoes, (4) threatened the employees in the store with a handgun, (5) forced the employees to give him money from the cash registers as well as the safes in the offices, (6) zip-tied the employees; (7) attempted to steal or in fact stole the store's surveillance system, (8) fled the Dollar Tree carrying a plastic bag, and (9) fled to a Chevy Trailblazer parked distant from the location of the store.

13. Both Dollar Tree stores engage in and/or affect interstate commerce.

14. COTTON is a 37-year-old black male.

15. As explained in greater detail below, there is probable cause to believe that COTTON's cellular device was located within the area of the robberies at the time they occurred and that COTTON controls and drives the Chevy Trailblazer used in these robberies.

C. Identification of COTTON's Cellular Device

16. T-Mobile provided me Geo-Fence information about electronic devices that were or could have been in the area of the Dollar Tree stores when they were robbed on May 16, 2021 and May 23, 2021. Specifically, T-Mobile provided records for specific electronic device identifiers known as IMSI (International Mobile Subscriber Identity) for electronic devices that were within the area of stores at the time they were robbed. There were 13 IMSIs that had records showing that they were present in both Dollar Tree locations at the time of the robberies.

17. T-Mobile subscriber data associated with these 13 IMSI identifiers revealed that one of the accounts returned to the name Queen Corbitt with an address of 9254 Wade Detroit, MI. Record checks and physical surveillance lead me to believe this is a fake name and address. The specific IMSI number associated with this account was 310260056221287 and had an IMEI (International Mobile Equipment Identity) of 353986104608677. IMEI is a unique, 15-digit code that is given to every mobile phone. This number is used by

service providers to uniquely identify devices. T-Mobile subscriber data shows that this device was associated to the cellular telephone number of 313-685-3880 during the time of the May 2021 robberies.

18. On July 14, 2020, ANTONIO LEE COTTON (DOB xx/xx/1984), who was on parole at the time, provided cellular telephone number 313-685-3880 to the Michigan Department of Corrections as his contact phone number. He provided this phone number to his parole officer as a contact number for him. The device associated with this phone number, as described above, will be hereinafter referred to as “Cotton’s Cellular Device.” COTTON also provided his home address to his parole officer, which a residence on Rockcastle Drive in Harper Woods, Michigan. COTTON continues to be on parole.

19. Further analysis of the Geo-Fence data associated to Cotton’s Cellular Device revealed that, for both robberies, the device had location records consistent with the approximate time the subject entered the stores as reflected in the surveillance footage.

20. Additionally, I was informed of an armed robbery of a Dollar Tree located at 17931 E. Warren Detroit, Michigan that occurred on January 10, 2021 at approximately 7:55pm. During that robbery, two black males were being walked to the exit by one of the employees when one of the black males pulled a black gun. The male who pulled the gun was wearing a black baseball cap, black mask,

black jacket, tan pants, and white shoes. The two males instructed the employees to lock the door and get on the ground. The two males then stole approximately \$6,500 from the store. On January 11, 2021, one of the employees was shown a lineup including COTTON and identified COTTON as the male who pulled the gun during the robbery.

21. On January 20, 2021, COTTON was arrested for this January 10 robbery during a traffic stop. During a search incident to COTTON's arrest, a cellular device was taken out of the right pocket of the black jacket he was wearing. This device was later confirmed to be an Apple iPhone 11 Model: A2111, IMEI: 353986104608677. This IMEI number is the same one as that of the electronic device identified in Paragraph 17 as having records present in the May 16 and May 23, 2021 robberies.

22. The device was returned to COTTON in March 2021 because the charges against him for January 10 robbery were dropped after the main witness in the case was unable to testify in court.

23. A review of historical cellular data for COTTON's phone number revealed that on May 16, 2021, at approximately 6:16pm, the number made an outgoing call to the Dollar Tree that was robbed that night at 2050 E. 8 Mile, Detroit, MI. Further review revealed that on May 23, 2021, the number attempted

to make two outgoing calls to the Dollar Tree that was robbed that night at 16551 E. 10 Mile Road, Eastpointe, MI. The two call were at 5:44 PM and at 5:45 PM.

D. Physical Surveillance and Cell Phone Data Associating COTTON with the Cellular Device and a Chevy Trailblazer

24. Recent location information for Cotton's Cellular Device, combined with physical surveillance, demonstrates that COTTON continues to be in possession of the device. His continued possession of the device, coupled with his possession of the device back in January 2020 and his providing the phone number associated with the device to his parole officer, is evidence that the device belongs to him. That the device belongs to him establishes probable cause to believe that he possessed the device when it was in the location of the May 16 and May 23 robberies. Additionally, as explained in greater detail below, law enforcement has recently seen COTTON driving what appears to be the same Chevy Trailblazer used during the two robberies.

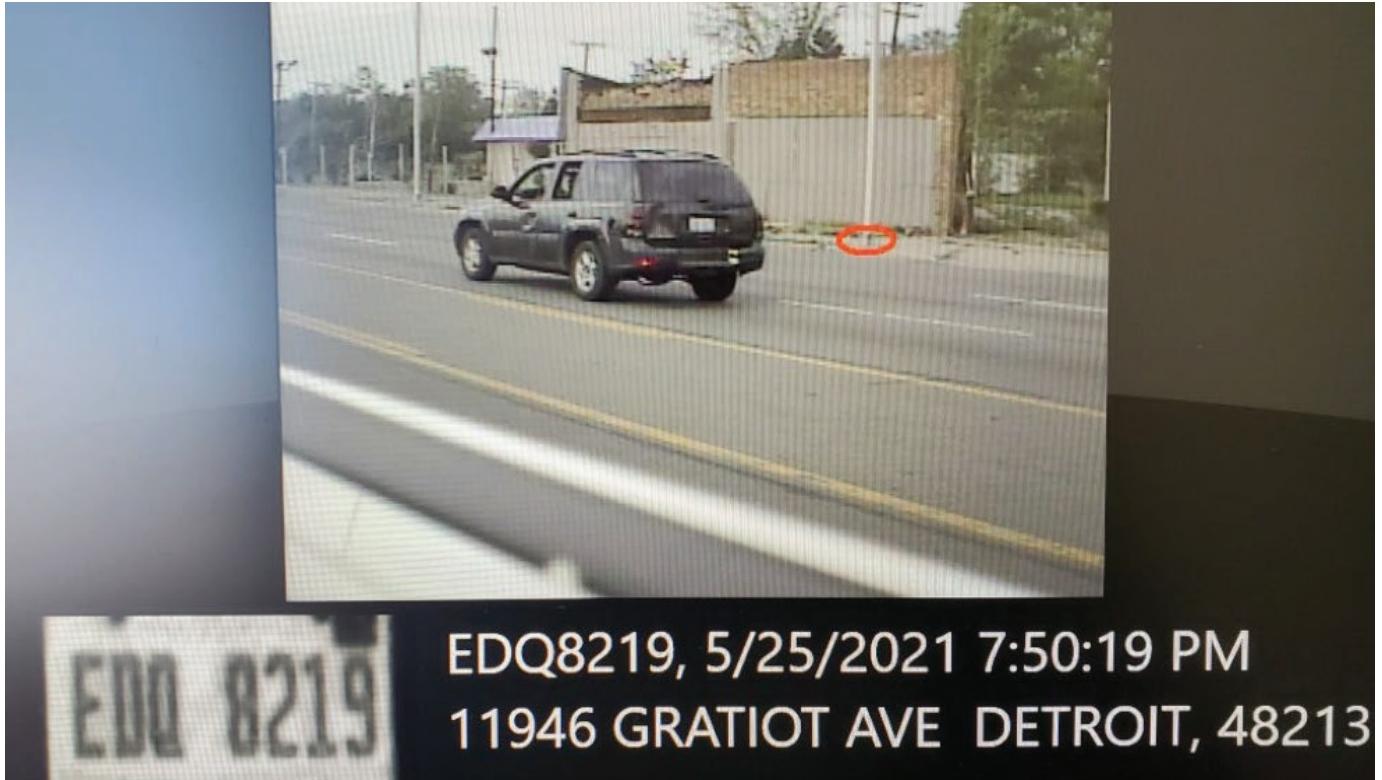
25. Specifically, on June 16, 2021, members of the VCTF were reviewing Pen Register data and GPS Ping data obtained from T-Mobile pursuant to an authorized Federal Search Warrant for Cotton's Cellular Device.

26. Based on that data, VCTF members deployed to an area around Moross and Huntington in Detroit, Michigan, where they located a Dark Grey Chevrolet Trailblazer with license plate EDQ8219 (MI) (the "subject vehicle"). They located the subject vehicle in front of 16492 Fairmount Drive,

Detroit, Michigan. The license plate for the subject vehicle was expired and last registered to an individual with the initial I.J.C. A review of the pen register data revealed that the number (313) 685-6543, which was registered to I.J.C., had incoming and outgoing calls to Cotton's Cellular Device on June 17, 2021.

27. Consistent with the vehicle depicted in the surveillance footage of the May 16, 2021 robbery, the subject vehicle was dark gray in color, had physical body damage to the driver-side front door, and the driver-side rear wheel was missing a center cap.

28. Law enforcement ran the license plate through the City of Detroit License Plate Readers (LPR) and determined that the subject vehicle was seen on various LPRs throughout the City of Detroit between May 3, 2021 and June 18, 2021. LPR pictures of the subject vehicle reflect that both before and after the May 2021 robberies, the subject vehicle had the same body damage to the driver-side front door. Below is a screenshot taken from an LPR reader in Detroit on May 25, 2021.



29. Therefore, there is probable cause to believe that the subject vehicle is the same vehicle that was used in the robberies on May 16, 2021 and May 23, 2021.

30. There is further probable cause to believe that COTTON controls the subject vehicle. On June 17, 2021, VCTF conducted physical surveillance on the subject vehicle, which was parked at a residence on Fairmount Street in Detroit, MI (the “Fairmont residence”). VCTF members saw a male matching COTTON’s description exit the front door of the Fairmont residence and talk to someone sitting a white Chevrolet Cobalt occupied by a black female and white

male. Review of COTTON's Facebook account revealed a post on June 5, 2021, indicating COTTON purchased a white Chevrolet Cobalt for his sister. Based on a review of associated Facebook profiles, the black female appeared to be COTTON's sister referenced in the Facebook post.

31. Approximately 20 minutes later, COTTON exited the front door of the Fairmount residence and entered the Subject Vehicle. COTTON was wearing gold glasses, grey sweatpants, bright white shoes, and no mask. The sweatpants and white shoes appear to be similar to what the robber was wearing as depicted on surveillance footage from the May 23, 2021 robbery.

32. VCTF members continued surveillance of COTTON driving the Subject Vehicle as a sole occupant. The subject vehicle traveled to the area of the Rockcastle Street residence that COTTON registered with MDOC.

33. During this same time, VCTF members were monitoring the GPS Pings associated to Cotton's Cellular Device. VCTF members concluded that the subject vehicle's travel and Cotton's Cellular Device were consistent. In other words, during the physical surveillance, Cotton's Cellular Device was pinging in the same area that VCTF members observed COTTON. Therefore, there is probable cause to believe that COTTON possessed and controlled the device during this surveillance period.

34. Additionally, on June 21, 2021, at about 1:30pm, VCTF members observed COTTON standing with three others on the porch of the Fairmont residence, and the subject vehicle parked in the driveway.

35. On June 22, 2021 VCTF members saw the subject vehicle parked in the driveway of a residence on Tacoma Street in Detroit, MI. The pings associated with Cotton's Cellular Device from June 21, 2021 at approximately 11:00pm to June 22, 2021 at approximately 10:30am encompass that address. On June 22, 2021, VCTF members saw COTTON exit the front door of this residence at approximately 10:25am and move the subject vehicle from the driveway to the street.

36. In sum, the evidence described above establishes probable cause to believe the following. First, the same person committed both robberies because of the similarity in the subject's description and the similar modus operandi. Second, COTTON is the same race and age as the suspect and was seen wearing similar pants and shoes to those worn during the May 23, 2021 robbery. Third, a specific cellular device was within the area of the robberies at the time they occurred and at the time that the robber is depicted on surveillance footage entering both stores. Fourth, COTTON possesses and uses that cellular device. Fourth, the phone number associated with that device called both Dollar Tree stores shortly before they were robbed. Fifth, COTTON controls and drives the Chevy Trailblazer used

during the robberies. Taken together, this establishes probable cause to believe that COTTON robbed the Dollar Tree stores on May 16, 2021 and May 23, 2021.

IV. Conclusion

37. Based on the foregoing, I respectfully submit that there is probable cause exists to believe that ANTONIO LEE COTTON, committed violations of 18 U.S.C. § 1951 (Interference with Commerce by Robbery) on May 16, 2021 and May 23, 2021.



Matthew Allwes
Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence and/or by reliable electronic means.



Honorable Curtis Ivy, Jr.
United States Magistrate Judge

Dated: June 24, 2021